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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) NO. CR 19-658 JD
)
14 Plaintiff,) STIPULATION AND PROPOSED ORDER TO
) RESET HEARING DATE AND TO EXCLUDE
15 v.) TIME FROM APRIL 22, 2020 TO MAY 12, 2020
)
16 SATTAR QURAISH,)
)
17 Defendant.)
)

18
19 It is hereby stipulated, by and between counsel for the United States and counsel for defendant
20 Sattar Quraish, that the change of plea/trial setting hearing scheduled for April 22, 2020 be vacated, and
21 that the parties appear before the Court on May 12, 2020 at 10:00 a.m. for change of plea or trial setting.
22 The parties further stipulate that time be excluded under the Speedy Trial Act from April 22, 2020
23 through May 12, 2020.

24 Government and counsel for the defendant have conferred, and agree that time be excluded
25 under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing
26 the discovery already produced, as well as for continuity of counsel. For this reason, the parties stipulate
27 and agree that excluding time until May 12, 2020 will allow for the effective preparation of counsel and
28 for continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that

STIPULATION TO EXCLUDE TIME AND ~~PROPOSED~~ ORDER
Case No. CR 19-658 JD

1 the ends of justice served by excluding the time from April 22, 2020 through May 12, 2020 from
2 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
3 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that he has obtained approval from
5 counsel for the defendant to file this stipulation and proposed order.

6 IT IS SO STIPULATED.

7 DATED: April 6, 2020

/s/

DAVID J. WARD
Assistant United States Attorney

9 DATED: April 6, 2020

/s/

ELIZABETH FALK
Counsel for Defendant Sattar Quraish

11
12 ~~[PROPOSED]~~ ORDER

13 Based on the stipulation of the parties, the Court VACATES the change of plea/trial setting
14 hearing currently scheduled for April 22, 2020, and orders that the above-captioned matter be set on the
15 Court's criminal calendar for change of plea or trial setting on May 12, 2020, at 10:00 a.m.

16 Further, based upon the facts set forth in the stipulation of the parties, and for good cause shown,
17 the Court finds that failing to exclude the time from April 22, 2020 through May 12, 2020 would
18 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
19 preparation, taking into account the exercise of due diligence, and for continuity of counsel. 18 U.S.C. §
20 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
21 April 22, 2020 to May 12, 2020 from computation under the Speedy Trial Act outweigh the best
22 interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties,
23 IT IS HEREBY ORDERED that the time from April 22, 2020 through May 12, 2020 shall be excluded
24 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

25 IT IS SO ORDERED.

26 April 7, 2020
27 DATED: _____



HON. JAMES DONATO
United States District Judge